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August 29, 2022

VIA ECF

Honorable Lorna G. Schofield
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *Network Data Rooms, LLC v. Saulrealism LLC et al*
Case No.: 22-cv-02299-LGS
Image of Defendant Saul's Hard drive

Your Honor:

Please be reminded that Goldberger & Dubin, P.C., represents the Defendants in this action, Saulrealism LLC, and Ryan Saul. This letter is in response to the Court's Order requesting a letter "...clarifying whether the requested image of Defendant Saul's hard drive, or its functional equivalent, was made available to Plaintiff as a result of the restoration of the hard drive including any files that may have been deleted."

In response to Plaintiff's demands, the Defendants produced a mirror image of a Lenovo Thinkpad that was originally purchased in 2019. Plaintiff was able to restore the hard drive from the image. Defendant Ryan Saul exclusively used this electronic device to perform work for the Plaintiff. No files have been deleted from the hard drive. The computer does not have any files related to the Plaintiff's business on the hard drive because Mr. Saul would use this computer to remotely access the Plaintiff's virtual machine.

Mr. Saul has a personal computer which was not used to perform work for the Plaintiff. This device was not produced. It does not contain information that is reasonably calculated to lead to the discovery of admissible evidence. It would be overly burdensome to reproduce because it is a 2TB hard drive. Reproduction would be expensive, time consuming, and does not contain relevant information.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "R. Wong", is written over the printed name.

Renee M. Wong, Esq.
On behalf of Defendants
Goldberger & Dubin, P.C.
Of Counsel